

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 1, 2018.

Permit Number: **R30-00900004-2018**
Application Received: **December 17, 2020**
Plant Identification Number: **03-54-009-00004**
Permittee: **Jupiter Aluminum Corporation**
Facility Name: **Jupiter Coil Coating**
Mailing Address: **8963 River Road, Wellsburg, WV 26070**

Permit Action Number: *MM02* Revised: *April 19, 2021*

Physical Location:	Beech Bottom, Brooke County, West Virginia
UTM Coordinates:	528.81 km Easting • 4452.42 km Northing • Zone 17
Directions:	Facility is located on the west side of WV State Rt. 2, just south of Beech Bottom.

Facility Description

The Jupiter Coil Coating Plant manufactures coated metal coils under Standard Industrial Classification (SIC) code 3479.

This minor modification is to include pass through emissions routed to the RTO that were left out when the RTO (4C) was permitted under R13-2379F. These changes were approved under R13-2379G.

Emissions Summary

The pass-through combustion emissions from the Coil Coating Line #1 curing ovens are unchanged from what was permitted before R13-2379F was issued. Therefore, the total emissions being emitted from the RTO will be:

Potential Emissions from Natural Gas Combustion CCL #1

Pollutant	Emission Factor (lb/MMcf)	Curing Ovens Primary and Finishing		RTO (see notes)		Total (see notes)	
		Emission Rate (lb/hr)	Emission Rate (tpy)	Emission Rate (lb/hr)	Emission Rate (tpy)	Emission Rate (lb/hr)	Emission Rate (tpy)
PM	7.6	0.23	1.00	0.11	0.49	1.60	7.01
CO	84	2.52	11.04	1.24	5.41	3.76	16.45
NOx	100	3.00	13.14	0.74	3.24	3.74	16.38
SO2	0.6	0.02	0.08	0.01	0.04	0.03	0.12
VOC	5.5	0.17	0.72	0.08	0.35	11.09	48.56

Notes:

Emission factors for oven burners are from AP-42 Tables 1.4-1 and 1.4-2

Number of Burners on Curing Ovens: 6

Capacity of each burner on Curing Ovens: 5 MMBtu/hr

Capacity of burner of RTO: 15 MMBtu/hr

Worst-case Operating Hours: 8760 hr/yr

Total VOC emission rate includes process emissions.

Total PM emission rate includes process emissions.

Emissions from RTO are based on R13 Permit application and are based on AP-42 and include the use of a low NOx burner.

Title V Program Applicability Basis

Jupiter Aluminum Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30 in accordance with 45CSR§30-3.1.a.3. The facility is subject to 40 CFR 63, Subpart SSSS and was a major source of HAPs before the effective date of this subpart.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction Permits
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2379G	January 21, 2021	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's

operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V Permit during this Minor Modification:

- Condition 5.1.13 was updated to reflect the emission limits that include the pass through emissions from Coating Line 1 through the regenerative thermal oxidizer (control device ID: 4C; emission point: 12E).
- Condition 5.1.14 was updated to include a minimum destruction efficiency for existing RTO (3C) which will continue to operate until RTO (4C) is installed and running.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR Part 64 - Compliance Assurance Monitoring (CAM) - Emission units with a control device are subject to an NSPS and MACT. Therefore, the facility is exempt from Compliance Assurance Monitoring in accordance with 40 CFR §64.2(b)(1)(i).

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	Not Applicable for minor modifications.
Ending Date:	N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41286
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Jupiter Aluminum submitted a comment on March 23, 2021 about a typo in the header of pages 20-28 of R13-2379G. This comment had nothing to do with the changes made to the Title V permit, so no action was taken due to this comment.